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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

December 17, 1991

Jim Harper
Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Strasburg Landfill,
NPL Site
Newlin Twp, Chester Co.
Proposed Plan Comments
Operable Unit #3

Dear Mr. Harper:

The Department has completed its review of the Proposed Plan for Operable Unit #3 Subsurface, Cap remediation and Expanded Leachate Control.

Reduction of Toxicity, Mobility, or Volume Through Treatment Page
14 4th Paragraph 2nd Sentence

A Alternative 7 is not listed, this should state Alternate 5.

State Acceptance Page 16

PA DER provided EPA with Feasibility Study comments on June 24, 1991, EPA, Ecology and Environment, and PA DER representatives meet at E&E offices to discuss these comments on August 5, 1991. Finally the Commonwealths' concurrence or nonconcurrence will occur at the time of the RODs signing.

AR301225

Harper
December 17, 1991
page No.

The following Comments are from Central Office HSCP.

Summary of Site Alternatives Page 7

The proposed alternative 3 and 5 are essentially the same alternatives except for the treatment of the landfill gas emissions. Landfill gas treatment requirements, if needed, are design specific requirements (active or passive) and does not justify requiring separate alternatives (this is partially explained on page 17, second paragraph of this plan).

Summary of Site Alternatives Page 7

Alternative number 4 ends with the "and" ... and what?

Compliance with ARARs page 13 First Paragraph

In the last line the word "should" ... should be replaced with more convincing language.

OK The second paragraph should emphasize what type of landfill cap and the appropriate regulations to be complied with.

One of the major risks and risk pathways identified at the site is groundwater contamination. However, the groundwater remediation ARAR, state and federal, is not addressed in this section.

A Proposed Plan should address ARARs on a general basis as a Proposed Plan is considered a public notification document. However, the supporting federal and state ARARs. It should be noted that this requirement will be necessary for the Record of Decision and must be complied with as stated in our Draft FS comments on June 24, 1991.

Summary of Preferred Interim alternatives Page 16

The word "interim" must be explained. It is not defined in the Alternative Evaluations or in this Preferred Alternative Summary. It is my understanding that the two previous operable units were considered interim.

The risk and risk pathway involving groundwater and the preferred alternative are inconsistent with EPA's Groundwater Protection Strategy for an aquifer that is a current and potential source of drinking water (class II aquifer). Groundwater sampling has documented offsite contamination above MCLs in residential wells and monitoring wells.

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Harper
December 17, 1991
page No.

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be
done*

To justify a remedial alternative that practically ignores groundwater remediation, this Proposed Plan and supporting documents should model the natural attenuation of groundwater with the RCRA cap in place. Groundwater ARARs both Federal (MCLs) and State (background) should be evaluated in this model. The Departments background groundwater ARAR must be addressed in this plan for all alternatives considered for the longterm effectiveness and reduction of toxicity and mobility criteria.

If you have questions please contact me at 215-832-6172. Thank you.

Respectfully,

Bruce A. McClain

Bruce A. McClain
Hydrogeologist

cc: Mr. Danyliw
Mr. Cole
Mr. Sheehan
Mr. Olewiler
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